June 4, 2010

BY ELECTRONIC MAIL

Mrs. Susan M. Hudson, Clerk
Vermont Public Service Board
Chittenden Bank Building, Fourth Floor
112 State Street, Drawer 20
Montpelier, Vermont 05620

Re: Board Rule 5.500 – Reply Comments on Draft Model Documents

Dear Mrs. Hudson:

Green Mountain Power Corporation (GMP) hereby submits comments in reply to the initial comments submitted by the Central Vermont Public Service Corporation (CVPS) and the Interstate Renewable Energy Council (IREC) on May 21, 2010 in the context of the Vermont Public Service Board (Board) Rule 5.500 Interconnection Working Group (the Working Group). Today's comments supplement GMP's comments of May 21, 2010. The May 21, 2010 initial comments were on a set of draft model documents[1] that were provided to the Board and interested parties on May 17, 2010 for use within the framework of Rule 5.500.

As a general matter, GMP continues to view the efforts of the Working Group as cooperative and productive and looks forward to continued participation with the Working Group. Specific reply comments by GMP on CVPS's and IREC's initial comments follow:

In its letter of May 21, 2010, CVPS states that all interconnections, including those made for net metering projects under Rule 5.100, should be subject to the same interconnection procedures and standards as all other generation interconnects. GMP agrees with CVPS that interconnection requirements should not vary based on the business arrangements developed to account for

[1] The draft model documents include the Draft Mutual Nondisclosure Agreement, Draft Feasibility Study Agreement, Draft System Impact Study Agreement, Draft Interconnection Facilities Study Agreement, Draft Generation Interconnection Agreement, and Draft Metering Agreement.

energy delivery and further agrees that the Board's process should be continued so that unified interconnection procedures can be adopted.

In its letter of May 21, 2010, IREC states that the Generation Interconnection Agreement (GIA), at Section 5.0, should not be limited by a term. GMP continues to disagree with this approach. While not repeating our comments of May 21, 2010 in full, we note that setting a definitive term allows the Interconnecting Utility some flexibility to adapt to changing system conditions while at the same time providing the Interconnection Requester the certainty of provisions for a definitive time period. GMP also notes that the New England Independent System Operator (ISO) Standard Small Generator Interconnection Agreement includes provisions for a term.[2]

With respect to Section 8.0.1 of the Draft GIA, IREC states that Interconnection Requesters with inverter-based systems should be exempt from the requirement to provide copies of all relay settings to the Interconnecting Utility. IREC argues that the relay settings for inverters are specified in IEEE 1547, tested for conformity under UL 1741, and that compliant relays have the same relay settings. IREC concludes that providing these relay settings, which never change, would be a waste of resources. Contrary to IREC's view, GMP believes that relay settings should be provided to the Interconnecting Utility for the simple reason that relay settings will not always be the same. For example, in IEEE 1547, Section 4.2.4 on Frequency, the standard states that for distributed resources (DR) of less than 30 kW, frequency set points and clearing times may be field adjustable, and that for DR greater than 30 kW, frequency set points *shall* be adjustable. Similarly, in IEEE 1547, Section 4.2.6 on Reconnection, the standard provides for an adjustable time delay for reconnecting the DR to the system following a disturbance. Because the Interconnecting Utility is ultimately responsible for the safety and reliability of its electric system, it is appropriate that the Interconnecting Utility be apprised of these and all relay settings of the interconnected DR.

Finally, with respect to Section 9.1.5 of the Draft GIA, IREC recommends that "material" modification be defined to avoid disputes, and that material be defined as a change to a Generating Facility that would cause it to fail one or more interconnection screens. In the view of GMP, a material change to a Generating Facility would be difficult to define and recommends that the language in the Draft GIA remain. With respect to IREC's suggestion that material be defined as a change to a Generating Facility that would cause it to fail one or more interconnection screens, GMP believes that this provision would place the operator of the Generating Facility in the position of having to analyze the effects that changes to the Generating Facility would have on the Interconnecting Utility's system. GMP notes that this is a responsibility appropriately held by the Interconnecting Utility itself. GMP also notes that the ISO's Standard Small Generator Interconnection Agreement contains a similar section on modifications and that "material" is not defined therein.

[2] See http://www.iso-ne.com/genrtion_resrcs/nwgen_inter/smgen_20/small_generator_interconnection_agreement_02012009.pdf

GMP appreciates this opportunity to submit its comments to the Board. Please don't hesitate to contact me if you have any questions.

Respectfully,

/s/

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